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ORIGINAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

(23)
8/5/02
ny

FILED
HARRISBURG, PA

AUG 02 2002

MARY E. D'AMICO, CLERK
Per *[Signature]* Deputy Clerk

SAMMI D. WRIGHT

Plaintiff

VS.

**BEULAH HADRICK,
CHARLEEN SAZBO,
SCOTT SHREVE AND
RAY KENT,**

Defendants

CIVIL ACTION LAW

1:CV-00-1657

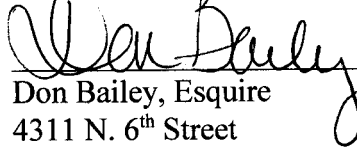
(JUDGE RAMBO)

JURY TRIAL DEMANDED

JOINT MOTION TO ENLARGE DISCOVERY TIME

- 1.) This is a joint motion to enlarge the time for discovery in the above captioned matter for 30 days although plaintiff is requesting 45 days or until September 30, 2002.
- 2.) Due to unforeseen events and scheduling difficulties the parties foresee the need of additional time to assist in the disposition of this case.
- 3.) The parties believe the interests of judicial economy will be served by this request.
- 4.) Without the additional time the parties will not be able to complete discovery.
- 5.) All parties concur in this request.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Don Bailey", written over a horizontal line.

Don Bailey, Esquire
4311 N. 6th Street
Harrisburg, Pa 17110
(717) 221-9500

August 2, 2002

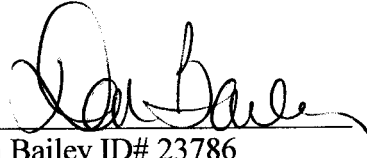
CERTIFICATE OF SERVICE

I hereby certify that on this ^{2nd} day of August 2002 a true and correct copy of the foregoing **JOINT**

MOTION FOR ENLARGEMENT OF TIME was served upon the following counsel of

record by United States Mail, postage prepaid and by Fax:

MARY CATHERINE FRYE
ASSISTANT U.S. ATTORNEY
P.O. Box 11754
228 Walnut Street
Harrisburg, Pa 17108-1754

BY: 
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